



November 15, 2013

*Ex Parte*

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Special Access Rates for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593*

Dear Ms. Dortch:

On November 14, 2013, the undersigned and Colleen Boothby, on behalf of the Ad Hoc Telecommunications Users Committee ("Ad Hoc"), met via teleconference with Kalpak Gude, William Layton, Elizabeth McIntyre, Eric Ralph, and Deena Shetler of the Wireline Competition Bureau, to discuss the data collection adopted in the above-referenced proceeding.

We discussed the scope of the data collection as recently clarified in the Bureau's *Report and Order*<sup>1</sup> in the above-referenced proceeding. We explained that, even with the specific exclusions<sup>2</sup> adopted in the *Report and Order*, the data collection will still apply to tens of thousands of entities that are subject to the FCC's jurisdiction solely because they hold radio licenses used for private, internal communications and not for the provision of communications service to the public. We urged the staff to consider further clarifications and exclusions to avoid imposing an unreasonably burdensome reporting requirement on entities that are subject to the Commission's jurisdiction solely because they hold such licenses.

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<sup>1</sup> *Special Access Rates for Price Cap Local Exchange Carriers*, WC Dkt. No. 05-25, AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593, Report and Order, DA 13-1909 (rel. Sept. 18, 2013).

<sup>2</sup> *Id.*, Appendix A (Instructions for Data Collection for Special Access Proceeding WC Docket No. 05-25, RM-10593) at 5.



Pursuant to Section 1.1206(b) of the Commission's Rules, this letter is being filed electronically in the above-referenced proceeding. Please feel free to contact me with any questions or concerns regarding this filing.

Very truly yours,

*/s/ Jeffrey L. Sheldon*

Jeffrey L. Sheldon  
Counsel, Ad Hoc Telecommunications Users  
Committee

cc: Kalpak Gude  
William Layton  
Elizabeth McIntyre  
Eric Ralph  
Deena Shetler